

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director
and Attorney-in-Chief

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

September 12, 2023

Via ECF

The Honorable Ronnie Abrams
Southern District of New York
40 Foley Square
New York, NY 10007

Application denied.

SO ORDERED.



Ronnie Abrams, U.S.D.J.
September 19, 2023

Re: United States v. Pedro Rosario
21 Cr 484 (RA)

Dear Judge Abrams:

I write to request the Court amend Mr. Rosario's conditions of release to remove the condition of electronic monitoring and a curfew. Probation and the Government oppose this request.


Mr. Rosario voluntarily surrendered to the Southern District of New York on April 10, 2023. Since that time, according to his Probation Office Patrick Fountain, he has been fully compliant with the terms of his electronic monitoring. Mr. Rosario must also check in with his officer in Pennsylvania, where his state case is pending, once a week as well as the bail bondsman who paid his Pennsylvania bail twice a week. Given this robust supervision and his five months of compliance, electronic monitoring is no longer necessary to ensure the safety of the community or that Mr. Rosario returns to Court.

The Government and Probation oppose this request because of the nature of the violation conduct. Mr. Rosario is alleged to have left the District without permission and committed a new drug trafficking offense). However, given Mr. Rosario voluntarily surrendered and has been compliant for five months, Probation and the Government can be assured that he will comply with any geographic restrictions without the need for an ankle monitor. Thank you for the Court's consideration.

PEDRO ROSARIO (9.12.23)

PAGE 2 OF 2

Respectfully submitted,

/s/ 

Ian Marcus Amelkin, Esq.
(212) 417-8733

cc: AUSA Jerry Fang, Esq.